

From: [Gwen Whitley](#)
To: [DHSR.SMFP.Petitions-Comments](#)
Subject: [External] Eliminate 2023 SMFP Home Health Agency Need
Date: Wednesday, August 10, 2022 2:34:46 PM
Attachments: [facebook_f0d3b25d-3e25-44bc-b119-c8ae81ada746.png](#)
[Instagram_b2d2973a-f0a0-4e84-8951-0fabf6d54e9e.png](#)
[youtube_1f691ade-51c8-419c-8c79-7164fa9e84d7.png](#)
[mission_33c9d466-2a34-4c14-80b5-5ac8ede2f9b9.png](#)

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To whom it may concern,

The purpose of these comments is to support the elimination of the 2023 SMFP Home Health Agency Need Determinations and to conduct a further study of the data and methodology. Lower Cape Fear Lifecare is the largest hospice in southeastern North Carolina and we work closely with current home health agencies in our 7 county service area. Collaboration between hospice and palliative care with home health agencies in providing appropriate continuity of care is vital. Hospice patients are referred to Home Health agencies in our communities if they no longer qualify for hospice services or may not be eligible at the time of the hospice referral if there is a need for home health. Palliative care can be provided concurrently with Home Health and this is the greatest area of collaboration, many palliative care patients need home health services. We have never experienced difficulty with our existing Home Health agencies in their ability to accept these patients and provide the needed services without delay.

Home Health providers have experience the same challenges that we have during the pandemic:

- Reluctance of patients to accept services based on fear of outsiders coming into their homes
- Decrease in referrals across the home care population secondary to limited access to patient's primary physician to determine the need for home health services
- Severe workforce shortages

These extraordinary circumstances make it difficult to determine capacity and need for additional new home health agencies.

Benefits of North Carolina being a CON State:

- Prevents proliferation of Home Health agencies in the state that does affect quality of care
- Determination of 12 new Home Health agencies far exceed the historical data in determining need
- Determination of 12 new CON's is not an incremental increase that will provide important data on determining further needs

Lower Cape Fear LifeCare respects and are grateful for the healthcare planning process which generates the Need Determination and applaud your work. Thank you for allowing the submission of comments.

Regards,
Gwen Whitley



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